

JON CRAIG 4/2/2009

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in)
his capacity as ATTORNEY)
GENERAL OF THE STATE OF)
OKLAHOMA and OKLAHOMA)
SECRETARY OF THE ENVIRONMENT)
C. MILES TOLBERT in his)
capacity as the TRUSTEE FOR)
NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

No. 05-CV-00329-GKF-PJC

TYSON FOODS, INC, et al.,)

Defendants.)

VIDEOTAPED DEPOSITION OF JON CRAIG,
before the undersigned Certified Shorthand Reporter,
taken on behalf of the Defendants, at the Department of
Environmental Quality, 707 North Robinson, Oklahoma
City, Oklahoma, commencing at 9:06 a.m., on April 2,
2009, pursuant to the stipulations of the parties.

NICHOLE M. MYERS, RPR, CSR #1704

NICHOLS McCLANAHAN REPORTING
Two Main Plaza
616 South Main, Suite 302
Tulsa, Oklahoma 74119-1261
(918) 585-9969 * * * FAX (918) 585-9955

**NICHOLS McCLANAHAN REPORTING
918-585-9969**

EXHIBIT

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1 violations by any of those Defendants in the Oklahoma
2 portion of the IRW?

3 **A.** I don't know.

4 **Q.** Are you saying you're not aware?

5 **A.** I don't fully understand your question.

6 **Q.** Well, and I'm not sure how I can answer --
7 I mean how I can state it more specifically because
8 it is a general question. And I think I'll just have
9 to leave it as I asked it.

10 Are you aware as you sit here of any water
11 quality violations in the Oklahoma portion of the IRW
12 by any of the those Defendants?

13 **A.** No, sir.

14 **Q.** Okay. There are multiple sources of --
15 you ready? There are multiple source of nutrients to
16 the waters in the IRW; is that correct?

17 **A.** Yes, sir.

18 **Q.** And is it correct also that in order to
19 truly address the water quality issues you would have
20 to address all of the sources of nutrients in the
21 IRW?

22 **MR. BLAKEMORE:** Object to the form.

23 **Q.** (By Mr. Sanders) Nutrients to the waters
24 in the IRW?

25 **MR. BLAKEMORE:** Object to form.

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